

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SUNCO TIMBER (KUNSHAN) CO.,  
LTD.

Plaintiff,

v.

LINDA SUN, individually, DAVID SUN,  
individually, SHILLOCK YUAN-SUN,  
individually, and INFINITY WOOD  
PRODUCTS, LLC,  
Defendants.

**Civil Action No. 1:22-cv-10833**

LINDA SUN,  
Counterclaimant,

v.

SUNCO TIMBER (KUNSHAN) CO.,  
LTD.,  
Counterclaim Defendant.

**ANSWER TO COUNTERCLAIM**

Plaintiff and counterclaim defendant Sunco Timber (Kunshan) Co., Ltd. respectfully submits its answer to the counterclaim of defendant and counterclaimant Linda Sun.

**JURISDICTION**

1. Admit.
2. Admit.
3. Admit.
4. Admit.

5. Counterclaim defendant denies the allegations and inferences set forth in paragraph 5 of the Counterclaim.
6. Counterclaim defendant denies the allegations and inferences set forth in paragraph 6 of the Counterclaim.

**CLAIM FOR RELIEF**

**Count One  
Recognition of Foreign Judgment  
G.L.c. 235, § 23A**

7. Counterclaim Defendant denies and admits this incorporating allegation in accordance with its other responses.
8. Counterclaim defendant denies the allegations and inferences set forth in paragraph 8 of the Counterclaim.
9. Counterclaim defendant denies the allegations and inferences set forth in paragraph 9 of the Counterclaim.
10. Admit.
11. Counterclaim defendant denies the allegations and inferences set forth in paragraph 11 of the Counterclaim.
12. Counterclaim defendant denies the allegations and inferences set forth in paragraph 12 of the Counterclaim.
13. Admit.
14. Counterclaim defendant denies the allegations and inferences set forth in paragraph 14 of the Counterclaim.
15. Counterclaim defendant denies the allegations and inferences set forth in paragraph 15 of the Counterclaim.

**FIRST AFFIRMATIVE DEFENSE**  
**Failure to State A Claim**

Counterclaimant fails to state a claim upon which relief can be granted.

**SECOND AFFIRMATIVE DEFENSE**  
**Estoppel**

As a result of Counterclaimant's actions, she is barred from enforcing her claims.

**THIRD AFFIRMATIVE DEFENSE**  
**Waiver**

Counterclaimant's conduct, actions and words constitute a waiver of her claims.

**FOURTH AFFIRMATIVE DEFENSE**  
**Laches**

Counterclaimant is barred by the doctrine of laches as a result of her conduct from pursuing her claims.

**FIFTH AFFIRMATIVE DEFENSE**  
**Reservation of Rights**

Counterclaim Defendant reserves any additional and further defenses as may be revealed during discovery or upon the receipt of additional information.

**PRAYER FOR RELIEF**

Counterclaim Defendant prays for the following relief:

- a. That Counterclaimant take nothing by way of this action;
- b. Counterclaim Defendant be awarded its attorneys' fees and costs; and
- c. Any remedy the Court deems just and equitable.

**REQUEST FOR TRIAL BY JURY**

Counterclaim Defendant hereby requests that this matter be tried by jury.

**DATED: October 9, 2024**

**PLAINTIFF and COUNTERCLAIM DEFENDANT,**  
Sunco Timber (Kunshan) Co., Ltd.  
By its attorneys,

/s/Connie C. Dai

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**CERTIFICATE OF SERVICE**

I hereby certify that the above document was filed through the CM/ECF system and will be electronically sent to the registered participants as identified on the Notice of Electronic Filing (NEF) on this October 9, 2024.

/s/Timothy K. Cutler

Timothy K. Cutler